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District of Nevada  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TENIYA G. DAVIS,

Plaintiff,

vs.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

CIVIL NO. 2:18-cv-01968-APG-VCF

**DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME**

IT IS HEREBY STIPULATED, by and between Teniya G. Davis (Plaintiff) and Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of thirty (30) days to deliver her Motion for Summary Judgment and in Opposition to Plaintiff's Motion for Summary Judgment. The current due date is March 8, 2019. The new due date will be April 8, 2019. The parties further stipulate that all other dates will be extended accordingly.

This is the first extension of time requested by Defendant in the above-captioned matter. Defendant requests this extension because the attorney underwent a medical procedure last week and requires time to recuperate. This request is made in good faith with no intention to unduly delay the

1 proceedings. Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
2 motion, on March 5, 2019. It is therefore respectfully requested that Defendant be granted a thirty (30)  
3 day extension of time to respond to Plaintiff's motion, up to and including April 8, 2019.  
4

5 Respectfully submitted,

6 Dated: March 5, 2019

7 By: /s/ Cyrus Safa \*  
8 CYRUS SAFA  
9 Law Offices of Lawrence D. Rohlfing  
10 Attorney for Plaintiff  
11 (\*by email authorization on 3/5/19)

12 Dated: March 5, 2019

13 NICHOLAS A. TRUTANICH  
14 United States Attorney  
15 District of Nevada

16 By: /s/ Gina Tomaselli  
17 GINA TOMASELLI  
18 Special Assistant United States Attorney

19 Attorneys for Defendant

20 IT IS SO ORDERED



21 THE HONORABLE CAM FERENBACH  
22 UNITED STATES MAGISTRATE JUDGE

23 DATE: 3-18-2019  
24  
25  
26  
27  
28

1 IT IS HEREBY CERTIFIED THAT:

2 I, Gina Tomaselli, certify that the following individual(s) were served with a copy of the  
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method  
4 of service identified below:  
5

6 **CM/ECF:**

7 Cyrus Safa  
8 Law Offices of Lawrence D. Rohlfing  
9 12631 E. Imperial Highway, Suite C-115  
10 Santa Fe Springs, CA 90670  
11 Email: cyrus.safa@rohlflinglaw.com

12 Gerald Welt  
13 Gerald M. Welt, Chtd.  
14 732 S. Sixth Street, Ste. 200-D  
15 Las Vegas, NV 89101  
16 Email: gmwesq@weltlaw.com

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Dated: March 5, 2019

By: /s/ Gina Tomaselli  
GINA TOMASELLI  
Special Assistant United States Attorney

Attorneys for Defendant